## Jeffrey A. Rothman

Attorney at Law 315 Broadway, Suite 200 New York, NY 10007

Tel.: (212) 227-2980; Cell: (516) 455-6873 Fax: (212) 591-6343

rothman.jeffrey@gmail.com

February 25, 2016

## By ECF to:

The Honorable Ronald L. Ellis United States Magistrate Judge United States District Court for the Southern District of New York 500 Pearl Street New York, NY 10007

Re: Marisa Holmes v. City of New York, et al.; 14 Civ. 5253 (LTS)(RLE)

Dear Judge Ellis:

I am counsel for Plaintiff in the above-captioned action. The parties have conferred, and write jointly to respectfully provide Your Honor with this joint status report. The parties have agreed upon the following deposition dates. I respectfully request that Your Honor "so order" the following depositions to take place at my office on the following dates and times:

- Deputy Inspector Anthony Bologna: April 6, 2016 at 10 a.m.
- Sergeant Feldman: April 8, 2016 at 10 a.m.
- Detective Debonis: April 15, 2016 at 10 a.m.

Mr. Lucas, counsel for Defendants, wishes to depose two non-party deponents, Barbara Ross and Joshua Van Praag. I have spoken with them, and they are cooperating in scheduling their depositions without need for the issuance of subpoenae. The precise dates have not yet been determined, however, but will be shortly.

The parties thank the Court for its continued consideration in this matter.

Respectfully submitted,

/S/

Jeffrey A. Rothman

cc: Andrew Lucas, Esq. (by ECF)

\_

<sup>&</sup>lt;sup>1</sup> Opposing counsel has agreed upon these dates for each of these witnesses, but objects to the deposition dates being "so ordered."